

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Danielle Sivels,

Case No.: 0:23-CV-00894 (DWF-TNL)

Plaintiff,

v.

**STIPULATION TO EXTEND
DEADLINE TO ANSWER
COMPLAINT**

Ramsey County, the Ramsey County
Sheriff's Office, Inmate Services, Corp.,
Marquet Johnson in his individual capacity,
Inmate Services, Corp. John Does 1-5 in
their individual capacities Ramsey County
Sheriff supervisors John Does 6-10 in their
Individual and supervisory capacities,

Defendants.

The parties, through their Counsel, hereby stipulate and agree as follows:

1. On April 17, 2023, Plaintiff served a copy of the Summons and Complaint in this matter on Ramsey County. The County's response to the Complaint is therefore due on or before May 8, 2023.¹
2. Plaintiff's Complaint includes individual capacity claims against Ramsey County employees John Does 6 - 10.
3. Plaintiff has not yet served the summons and complaint on the Ramsey County Doe Defendants in their individual capacities. It is anticipated that when the Ramsey County Doe Defendants are identified, they will be asked to and will likely agree to waive serviced, but such waivers have not been confirmed yet.
4. Plaintiff's Complaint also includes claims against Inmate Services Corporation and several identified and unidentified individuals allegedly associated with Inmate Services Corporation.

¹ In this context, the County means Ramsey County, the Ramsey County Sheriff's Office, and Ramsey County employees in their official capacities.

5. Ramsey County Defendants anticipates they will likely assert cross-claims against Inmate Services Corporation and the Defendants allegedly associated with Inmate Services Corporation after such Defendants are served.
6. The parties agree that judicial economy will best be served by extending the deadline for Ramsey County to answer Plaintiff's Complaint. Otherwise, the Ramsey County Defendants will be required to file sequential answers as various Defendants are served. The parties agree that Plaintiff, all Defendants, and the Court will benefit from there being a single response to the Complaint on behalf of all Ramsey County Defendants and that additional time will enable Plaintiff to serve the remaining Defendants.
7. Pursuant to LR 7.1 and Fed. R. Civ. P. 6 (b)(1)(A), Counsel below have negotiated in good faith in an effort to resolve this matter without the need for formal motion practice. As a result of those negotiations, it is stipulated and agreed, subject to the approval of this Court, that the deadline for all Ramsey County to answer or otherwise respond to Plaintiff's Complaint should be extended by forty-five days to **June 22, 2023**.

JOHN J. CHOI
RAMSEY COUNTY ATTORNEY

Dated: May 3, 2023

By: /s/ Robert B. Roche
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Dated: May 4, 2023

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